

December 15, 2009 Project No. 013636

Mr. Ryan Benefield, P.E. Arkansas Department of Environmental Quality (ADEQ) 5301 Northshore Drive North Little Rock, Arkansas 77218

Subject: Cedar Chemical Company, Helena-West Helena, Arkansas

Arkansas Solid Waste Registration No. ARD990660649

Submittal of the Feasibility Study (FS)

Dear Mr. Benefield:

On behalf of ExxonMobil Chemical Co., and Helena Chemical Company, which comprise the Cedar Chemical Corporation Joint Defense Group ("the Group"), AMEC Geomatrix respectfully submits this Feasibility Study. This report addresses all of the ADEQ comments issued in letters dated September 10th, 2009 and October 28th, 2009.

Should you have any questions, please contact me at 512.330.3404.

Sincerely yours,

AMEC Geomatrix, Inc.

Kelly Beck

Senior Project Manager

cc: Dave Roberson, DeMaximis

Ed Brister, Helena Chemical Company Kevin Vaughn, ExxonMobil Corporation

Allan Gates, Mitchell, Williams, Selig, Gates & Woodyard, P.L.L.C.

Steve Walker, Terra Environmental

Dave Backus, EnSafe